

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

APR 27 2000

In the Matter of )  
 )  
Amendment of Section 73.622(b) )  
of the Rules )  
DTV Table of Allotments/Assignments )  
 )  
WANE-TV, Fort Wayne, Indiana )

MM Docket No. \_\_\_\_\_

To: Chief  
Policy and Rules Division

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**PETITION FOR RULEMAKING**

Indiana Broadcasting, LLC, licensee of Station WANE-TV (Facility ID 39270), Channel 15 (DTV Channel 4), Fort Wayne, Indiana, hereby requests that the DTV Table of Allotments/Assignments, Section 73.622 of the Rules, be amended to substitute DTV Channel 31 for the existing DTV Channel 4 allotment/assignment of WANE-TV. Indiana Broadcasting further requests that the Commission temporarily suspend consideration of its pending application for a construction permit for DTV Channel 4 (BPCDT-19991018AAQ) during the requested rulemaking proceeding.

Pursuant to Section 73.622(a), this request to amend the DTV table to change the DTV channel allotment of WANE-TV must be evaluated for technical acceptability under the engineering criteria set forth in Section 73.623(c) of the Rules. As shown in the attached Technical Exhibit prepared by W. Jeffrey Reynolds of du Treil, Lundin & Rackley, Inc., this request complies with the engineering criteria in Section 73.623(c). Specifically, as required by Section 73.623(c)(1), the proposed DTV channel change complies with the principal community

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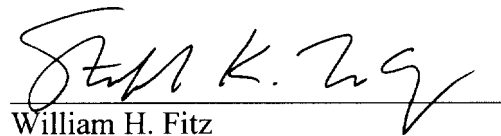
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coverage requirements of Section 73.625(a). The proposed change also falls below the two percent/ten percent threshold stated in Section 73.623(c)(2). A separation study, a summary of interference and service, and other relevant technical data are attached.

Thus, Indiana Broadcasting respectfully requests that the Commission issue a Notice of Proposed Rulemaking proposing to substitute DTV Channel 31 for the DTV Channel 4 existing allotment/assignment of WANE-TV, Fort Wayne, Indiana.

Respectfully submitted,

INDIANA BROADCASTING, LLC

A handwritten signature in black ink, appearing to read "Stan K. McCoy", written over a horizontal line.

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April 27, 2000

TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV ALLOTMENT TABLE  
STATION WANE-TV  
FORT WAYNE, INDIANA

Technical Summary

This technical narrative and associated exhibits have been prepared on behalf of WANE-TV, Fort Wayne, Indiana, in support of a Petition for Rule Making to modify the DTV allotment of WANE-TV from VHF channel 4 to UHF channel 31.

DTV channel 31 can be substituted and allotted to Fort Wayne, Indiana in compliance with the principle community coverage requirements of Section 73.625(a) at reference coordinates Latitude 41°05'38", Longitude 85°10'48.<sup>1</sup> In addition, operation on DTV channel 31 appears possible with an effective radiated power (ERP) of up to 750 kW utilizing a nondirectional antenna and an antenna height above average terrain (HAAT) of 253 meters. The proposed channel change is acceptable under the 2 percent criterion for *de minimis* impact applicable to DTV allotment modifications under Section 73.623(c)(2). Therefore, it is proposed to modify WANE-TV's authorization to specify operation on the alternate DTV channel with the following specifications:

| State & City   | DTV Channel | DTV ERP (kW) | Antenna HAAT (m) |
|----------------|-------------|--------------|------------------|
| IN, Fort Wayne | 31          | 750          | 253              |

It is also proposed to amend the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, as follows:

| <u>City</u>         | <u>Channel No.</u> |                 |
|---------------------|--------------------|-----------------|
|                     | <u>Present</u>     | <u>Proposed</u> |
| Fort Wayne, Indiana | 4                  | 31              |

<sup>1</sup> This is the current site of WANE-TV's NTSC operation on channel 15 as well as the site being proposed in WANE-TV's DTV application to implement operation on channel 4.

Station WANE-TV is currently allotted VHF channel 4 for its DTV operation with an ERP of 1.0 kW and an HAAT of 253 meters. In addition, WANE-TV is also filing an application to implement the channel 4 DTV allotment which specifies a directional antenna maximum ERP of 1.5 kW and an HAAT of 243 meters.

Station WANE-TV proposes to allot UHF channel 31 at Latitude 41°05'38", Longitude 85°10'48". It is proposed to operate with an antenna radiation center height above mean sea level (RCAMSL) of 493 meters, an antenna radiation center height above average terrain of (HAAT) of 253 meters and a nondirectional antenna maximum ERP of 750 kW.

Figure 1 is a DTV channel 31 separation study toward other NTSC and DTV allotments based on a 161 kilometer "buffer". Although the separation requirements are only applicable to new DTV allotments, they can be used as an indication of which stations have the potential of receiving interference from the proposed channel 31 DTV operation.

Figure 2 provides a summary of interference and service for the proposed channel 31 allotment. Determination of interference and service was based on the procedures outlined in OET Bulletin No. 69 and criteria contained in Sections 73.622 and 73.623 of the FCC's rules.<sup>2</sup> It is believed that the proposed channel 31 operation is in full compliance with the FCC's 2%/10% interference criteria. In accordance with

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<sup>2</sup>The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

the FCC Public Notice released August 10, 1998 and entitled "Additional Application Processing Guidelines for Digital Television (DTV)", it is respectfully requested that the Commission review the proposal using a 1 kilometer cell size.

Figure 3 is a map which depicts the 41 dBu, noise limited contour for the proposed channel 31 DTV operation. Also shown are the city limits of Fort Wayne based on 1990 Census data. As indicated, all of Fort Wayne is located within the 41 dBu contour. Therefore, the proposed channel 31 DTV allotment will comply with the city coverage requirements contained in Section 73.625(a). Also shown on Figure 3 is the 64 dBu contour for WANE-TV's currently authorized NTSC channel 15 operation (BLCT-890914KG). As indicated, the proposed channel 31 operation will provide full replication of coverage.

Studies indicate that the proposed channel 31 operation will not result in the displacement of any existing or authorized TV translator or LPTV stations.

As the community of Fort Wayne, Indiana is located within 400 kilometers of the U.S.-Canadian border, concurrence by the Canadian government will likely be required for this proposal. Figure 4 is a tabulation of all Canadian NTSC and DTV allotments on channels 30, 31 and 32 located within 400 km of the proposed site. All the Canadian NTSC and DTV allotments are located at distances greater than the minimum distance set forth in Section D.3 (Proposed Canadian Tables) of the Canadian publication entitled "Digital Television, Service Considerations and Allotment Principles" prepared by the JTCAB Ad Hoc Group on DTV Planning Parameters (January 1997).

Conclusion

UHF channel 31 can be substituted for the current VHF DTV channel 4 allotment of WANE-TV in compliance with the FCC's rules concerning DTV allotment changes.

  
W. Jeffrey Reynolds

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(941) 3290-6000

April 24, 2000

TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV ALLOTMENT TABLE  
STATION WANE-TV  
FORT WAYNE, INDIANA

DTV TO NTSC Separation Study

Job Title : Proposed WANE-DT  
Zone : 1  
Channel 31 (572-578 MHz)

Separation Buffer 161 km  
FCC TV DB Date : 10/01/99  
Coordinates : 41-05-38 85-10-48

| Call<br>Status                   | City<br>St         | FCC File No.   | Channel<br>Zone | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bear.<br>True  | Dist.<br>(km) | Req.<br>(km)       |
|----------------------------------|--------------------|----------------|-----------------|--------------------|-----------------------|----------------|---------------|--------------------|
| WNDUTV<br>LIC                    | SOUTH BEND<br>IN   | BLCT-2559      | 16(o)<br>I      | 3800 DA<br>326     | 41-36-20<br>86-12-45  | 303.8<br>22.93 | 103.43        | 24.1/80.5<br>CLEAR |
| WNDUTV<br>CP MOD                 | SOUTH BEND<br>IN   | BMPCT-970814KE | 16(o)<br>I      | 5000 DA<br>326     | 41-36-20<br>86-12-45  | 303.8<br>22.93 | 103.43        | 24.1/80.5<br>CLEAR |
| WPTD<br>LIC                      | DAYTON<br>OH       | BLET-920807KG  | *16(+)<br>I     | 1510<br>350        | 39-43-16<br>84-15-00  | 152.4<br>91.17 | 171.67        | 24.1/80.5<br>CLEAR |
| LMRS<br>LAND MOBILE CHANNEL ONLY | DETROIT<br>MI      | -              | 16(o)<br>I      | 0                  | 42-19-48<br>83-02-57  | 51.4<br>0.00   | 224.28        | 0.0<br>LMRS        |
| CHWITV<br>APP                    | CHATHAM<br>ON      | -              | 16(-)<br>I      | 492<br>168         | 42-08-30<br>82-26-48  | 62.0<br>135.83 | 255.83        | 120.0<br>CLEAR     |
| ALLOC.                           | LIMA<br>OH         | -              | 17(o)<br>I      | 0                  | 40-35-18<br>84-25-55  | 131.5<br>3.96  | 84.46         | 24.1/80.5<br>CLOSE |
| SITE RESTRICTED 19.9 MILES SW.   |                    |                |                 |                    |                       |                |               |                    |
| WXMI<br>APP                      | GRAND RAPIDS<br>MI | BPCT-960716KN  | 17(-)<br>I      | 5000<br>334        | 42-41-15<br>85-31-57  | 350.8<br>98.91 | 179.41        | 24.1/80.5<br>CLEAR |
| WXMI<br>LIC                      | GRAND RAPIDS<br>MI | BLCT-911028KE  | 17(-)<br>I      | 1290<br>334        | 42-41-15<br>85-31-57  | 350.8<br>98.91 | 179.41        | 24.1/80.5<br>CLEAR |
| WNDYTV<br>LIC                    | MARION<br>IN       | BLCT-871007KF  | 23(o)<br>I      | 5000 DA<br>295     | 40-08-57<br>85-56-15  | 211.6<br>42.45 | 122.95        | 24.1/80.5<br>CLEAR |
| WNDYTV<br>CP                     | MARION<br>IN       | BPCT-981005KE  | 23(o)<br>I      | 5000 DA<br>294     | 40-08-57<br>85-56-15  | 211.6<br>42.45 | 122.95        | 24.1/80.5<br>CLEAR |
| WKARTV<br>LIC                    | EAST LANSING<br>MI | BLET-790912KF  | *23(-)<br>I     | 1230<br>296        | 42-42-08<br>84-24-51  | 19.3<br>109.12 | 189.62        | 24.1/80.5<br>CLEAR |
| ALLOC.                           | LAFAYETTE<br>IN    | -              | *24(o)<br>I     | 0                  | 40-25-11<br>86-53-39  | 243.1<br>82.48 | 162.98        | 24.1/80.5<br>CLEAR |
| WNWOTV<br>LIC                    | TOLEDO<br>OH       | BLCT-830503KE  | 24(-)<br>I      | 4370 DA<br>424     | 41-40-03<br>83-21-22  | 66.7<br>84.85  | 165.35        | 24.1/80.5<br>CLEAR |

| Call<br>Status   | City<br>St          | FCC File No. | Channel<br>Zone | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bear. True      | Dist.<br>(km)    | Req.<br>(km)        |
|--|---------------------|--------------|-----------------|--------------------|-----------------------|-----------------|------------------|---------------------|
| WBGUTV<br>LIC  | BOWLING GREEN<br>OH |              | *27(+)<br>I     | 1000<br>320        | 41-08-13<br>83-54-23  | 87.0<br>26.59   | 107.09<br>26.59  | 24.1/80.5<br>CLEAR  |
| ALLOCATED FROM CH. 57, LIMA, OH                          |                     |              |                 |                    |                       |                 |                  |                     |
| WSJV<br>LIC  | ELKHART<br>IN       |              | 28(+)<br>I      | 5000 DA<br>335     | 41-36-58<br>86-11-38  | 304.8<br>22.28  | 102.78<br>22.28  | 24.1/80.5<br>CLEAR  |
| WTTE<br>LIC  | COLUMBUS<br>OH      |              | 28(-)<br>I      | 1910<br>293        | 40-09-33<br>82-55-21  | 117.9<br>136.90 | 217.40<br>136.90 | 24.1/80.5<br>CLEAR  |
| WTTK<br>LIC  | KOKOMO<br>IN        |              | 29(-)<br>I      | 3090 DA<br>236     | 40-20-20<br>85-57-15  | 218.1<br>25.85  | 106.35<br>25.85  | 24.1/80.5<br>CLEAR  |
| WTTK<br>CP   | KOKOMO<br>IN        |              | 29(-)<br>I      | 5000 DA<br>236     | 40-20-20<br>85-57-15  | 218.1<br>25.85  | 106.35<br>25.85  | 24.1/80.5<br>CLEAR  |
| WGTETV<br>LIC  | TOLEDO<br>OH        |              | *30(+)<br>I     | 1000<br>314        | 41-39-26<br>83-25-55  | 66.2<br>53.07   | 159.07<br>53.07  | 12.0/106.0<br>CLEAR |
| WTIU<br>LIC  | BLOOMINGTON<br>IN   |              | *30(-)<br>I     | 832<br>216         | 39-08-32<br>86-29-43  | 207.7<br>138.00 | 244.00<br>138.00 | 12.0/106.0<br>CLEAR |
| WPXD<br>LIC  | ANN ARBOR<br>MI     |              | 31(+)<br>I      | 1230<br>329        | 42-22-25<br>84-04-14  | 32.5<br>-47.81  | 169.49<br>-47.81 | 217.3<br>SHORT      |
| THIS STATION AUTHORIZED SUBSCRIPTION TV - BSTCT-790920KF |                     |              |                 |                    |                       |                 |                  |                     |
| WPXD<br>CP   | ANN ARBOR<br>MI     |              | 31(+)<br>I      | 2880<br>329        | 42-22-25<br>84-04-10  | 32.6<br>-47.76  | 169.54<br>-47.76 | 217.3<br>SHORT      |
| ALOC.  | NEWARK<br>OH        | -            | *31(-)<br>I     | 0                  | 40-03-35<br>82-24-15  | 115.2<br>44.30  | 261.60<br>44.30  | 217.3<br>CLEAR      |
| WMBDTV<br>LIC  | PEORIA<br>IL        |              | 31(+)<br>I      | 2040 DA<br>195     | 40-38-07<br>89-32-19  | 263.5<br>153.68 | 370.98<br>153.68 | 217.3<br>CLEAR      |
| ALOC.  | XENIA<br>OH         | -            | 32(o)<br>I      | 0                  | 39-44-18<br>83-32-56  | 137.0<br>98.52  | 204.52<br>98.52  | 12.0/106.0<br>CLEAR |
| EFFECTIVE 7-15-88, SITE RESTR. 20.7 MILES EAST.          |                     |              |                 |                    |                       |                 |                  |                     |
| NEW<br>APP   | XENIA<br>OH         |              | 32(o)<br>I      | 5000<br>294        | 39-43-52<br>83-32-28  | 137.0<br>99.56  | 205.56<br>99.56  | 12.0/106.0<br>CLEAR |
| REQUESTS A WAIVER OF FREEZE                              |                     |              |                 |                    |                       |                 |                  |                     |
| CICOTV32<br>LIC  | WINDSOR<br>ON       |              | 32(+)<br>I      | 217<br>214         | 42-09-09<br>82-57-05  | 56.8<br>129.83  | 219.83<br>129.83 | 90.0<br>CLEAR       |
| WFLD<br>LIC  | CHICAGO<br>IL       |              | 32(o)<br>I      | 5000 DA<br>430     | 41-53-56<br>87-37-23  | 294.6<br>116.74 | 222.74<br>116.74 | 12.0/106.0<br>CLEAR |
| WKJGT<br>LIC   | FORT WAYNE<br>IN    |              | 33(-)<br>I      | 589<br>235         | 41-05-40<br>85-10-36  | 77.5<br>23.80   | 0.30<br>23.80    | 24.1/80.5<br>CLEAR  |
| WNIT<br>LIC  | SOUTH BEND<br>IN    |              | *34(-)<br>I     | 1380<br>246        | 41-36-59<br>86-11-43  | 304.8<br>22.40  | 102.90<br>22.40  | 24.1/80.5<br>CLEAR  |
| WOSUTV<br>LIC  | COLUMBUS<br>OH      |              | *34(o)<br>I     | 1170<br>329        | 40-09-34<br>82-55-22  | 117.9<br>136.86 | 217.36<br>136.86 | 24.1/80.5<br>CLEAR  |



| Call<br>Status        | City<br>St         | FCC File No.   | Channel<br>Zone | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bear.<br>True   | Dist.<br>(km)    | Req.<br>(km)  |
|-----------------------|--------------------|----------------|-----------------|--------------------|-----------------------|-----------------|------------------|---|
| WLIO<br>LIC           | LIMA<br>OH         | BLCT-890519KE  | 35(-)<br>I      | 661<br>165         | 40-44-54<br>84-07-55  | 113.2<br>15.78  | 96.28<br>15.78   | 24.1/80.5<br>CLOSE  |
| WGVUTV<br>LIC         | GRAND RAPIDS<br>MI | BMLCT-911016KH | *35(+)<br>I     | 1320<br>262        | 42-57-35<br>85-53-45  | 344.3<br>135.07 | 215.57<br>135.07 | 24.1/80.5<br>CLEAR  |
| WCPX<br>LIC           | CHICAGO<br>IL      | BLCT-2495      | 38(-)<br>I      | 5000 DA<br>381     | 41-53-56<br>87-37-23  | 294.6<br>142.24 | 222.74<br>142.24 | 24.1/80.5<br>CLEAR  |
| WFWA<br>LIC           | FORT WAYNE<br>IN   | BLET-920131KF  | *39(-)<br>I     | 1380<br>223        | 41-06-13<br>85-11-28  | 319.3<br>22.66  | 1.44<br>22.66    | 24.1/80.5<br>CLEAR  |
| WRGTTV<br>LIC         | DAYTON<br>OH       | BMLCT-860915KE | 45(o)<br>I      | 5000 DA<br>357     | 39-43-28<br>84-15-18  | 152.5<br>90.65  | 171.15<br>90.65  | 24.1/80.5<br>CLEAR  |
| WRGTTV<br>APP<br>APP. | DAYTON<br>OH       | BPCT-980617KE  | 45(o)<br>I      | 5000 DA<br>351     | 39-43-28<br>84-15-18  | 152.5<br>90.65  | 171.15<br>90.65  | 24.1/80.5<br>CLEAR<br>DISMISSED 08-17-98; PETITION FOR RECON. 09-16-98. |
| WHMETV<br>LIC         | SOUTH BEND<br>IN   | BLCT-2590      | 46(o)<br>I      | 1120<br>305        | 41-35-43<br>86-09-38  | 304.6<br>18.69  | 99.19<br>18.69   | 24.1/80.5<br>CLEAR  |

\*\* End of TV Separation Study for Channel 31 \*\*

**DTV to DTV Separation Study**

Job Title : Proposed WANE-DT  
Zone : 1  
Channel 31 (572-578 MHz)

Separation Buffer 161 km  
FCC DTV DB Date: 12/18/98  
Coordinates : 41-05-38 85-10-48

| Call<br>Status    | City<br>St       | FCC File No.    | Channel<br>Zone | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bear.<br>True  | Dist.<br>(km)   | Req.<br>(km)        |
|-------------------|------------------|-----------------|-----------------|--------------------|-----------------------|----------------|-----------------|---------------------|
| DWSBTTV<br>DTVALT | SOUTH BEND<br>IN |                 | 30<br>I         | 242.3<br>325       | 41-37-00<br>86-13-01  | 304.2<br>-5.59 | 104.41<br>-5.59 | 24.0/110.0<br>SHORT |
| DWRGTTV<br>DTVALT | DAYTON<br>OH     |                 | 30<br>I         | 133.5<br>357       | 39-43-28<br>84-15-18  | 152.5<br>61.14 | 171.14<br>61.14 | 24.0/110.0<br>CLEAR |
| DWFLD<br>DTVALT   | CHICAGO<br>IL    |                 | 31<br>I         | 218<br>430         | 41-53-56<br>87-37-23  | 294.6<br>26.43 | 222.73<br>26.43 | 196.3<br>CLEAR      |
| WFLD-DT<br>CP MOD | CHICAGO<br>IL    | BMPCDT-980807KE | 31<br>I         | 200 DA<br>475      | 41-52-44<br>87-38-10  | 293.9<br>26.59 | 222.89<br>26.59 | 196.3<br>CLOSE      |
| DWKRCTV<br>DTVALT | CINCINNATI<br>OH |                 | 31<br>I         | 839.3<br>305       | 39-06-58<br>84-30-05  | 165.1<br>30.80 | 227.10<br>30.80 | 196.3<br>CLEAR      |

| Call<br>Status | City<br>St | FCC File No.   | Channel<br>Zone | ERP(kW)<br>HAAT(m) | Latitude<br>Longitude | Bear. True | Dist.<br>(km) | Req.<br>(km) |
|----------------|------------|----------------|-----------------|--------------------|-----------------------|------------|---------------|--------------|
| WKRC-DT        | CINCINNATI |                | 31              | 800                | 39-06-59              | 165.1      | 227.06        | 196.3        |
| CP             | OH         | BPCDT-980731KP | I               | 278                | 84-30-07              |            | 30.76         | CLEAR        |
| DWJWTV         | CLEVELAND  |                | 31              | 937.2              | 41-21-47              | 83.0       | 291.97        | 196.3        |
| DTVALT         | OH         |                | I               | 305                | 81-42-58              |            | 95.67         | CLEAR        |
| WJW-DT         | CLEVELAND  |                | 31              | 625                | 41-21-47              | 83.0       | 291.98        | 196.3        |
| CP             | OH         | BPCDT-980803KX | I               | 317                | 81-42-58              |            | 95.67         | CLEAR        |
| DWNDYTV        | MARION     |                | 32              | 260.9              | 40-08-57              | 211.6      | 122.94        | 24.0/110.0   |
| DTVALT         | IN         |                | I               | 295                | 85-56-15              |            | 12.94         | CLOSE        |

\*\* End of DTV Separation Study for Channel 31 \*\*

TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV ALLOTMENT TABLE  
STATION WANE-DT  
FORT WAYNE, INDIANA

Interference and Service Summary

I. Interference Caused<sup>1</sup>

| Protected<br>NTSC/DTV Station                     | FCC Service<br>Population | Interference<br>Population | Unique Interference<br>Population* |
|---|---------------------------|----------------------------|------------------------------------|
| WNDU-TV, NTSC Ch. 16 (License)<br>South Bend, IN  | 1,470,384                 | 3,727 (0.3%)               | --                                 |
| WNDU-TV, NTSC Ch. 16 (CP)<br>South Bend, IN       | 1,328,843                 | 3,824 (0.3%)               | --                                 |
| WSJV, NTSC Ch. 28<br>Elkhart, IN                  | 1,334,588                 | --                         | 0 (0.0%)                           |
| DWSBT-TV, DTV Ch. 30<br>South Bend, IN            | 1,378,000                 | 27,072 (1.96%)             | --                                 |
| WPXD, NTSC Ch. 31 (License)<br>Ann Arbor, MI      | 3,197,953                 | --                         | 30,152 (0.9%)                      |
| WPXD, NTSC Ch. 31 (CP)<br>Ann Arbor, MI           | 4,392,023                 | --                         | 39,061 (0.9%)                      |
| DWFLD, DTV Ch. 31 (Allotment)<br>Chicago, IL      | 8,332,000                 | 20,642 (0.2%)              | --                                 |
| WFLD-DT, DTV Ch. 31 (CP)<br>Chicago, IL           | 8,301,327                 | 1,910 (0.0%)               | --                                 |
| DWKRC-TV, DTV Ch. 31 (Allotment)<br>Cleveland, OH | 2,800,000                 | --                         | 30,606 (1.2%)                      |
| DWKRC-TV, DTV Ch. 31 (CP)<br>Cleveland, OH        | 2,921,758                 | --                         | 37,030 (1.3%)                      |
| DWJW-TV, DTV Ch. 31 (Allotment)<br>Cleveland, OH  | 3,886,000                 | 1,918 (0.1%)               | --                                 |
| WJW-DT, DTV Ch. 31 (CP)<br>Cleveland, OH          | 3,928,463                 | 269 (0.0%)                 | --                                 |
| DWNDY-TV, DTV Ch. 32<br>Marion, IN                | 1,850,000                 | 1,575 (0.1%)               |                                    |

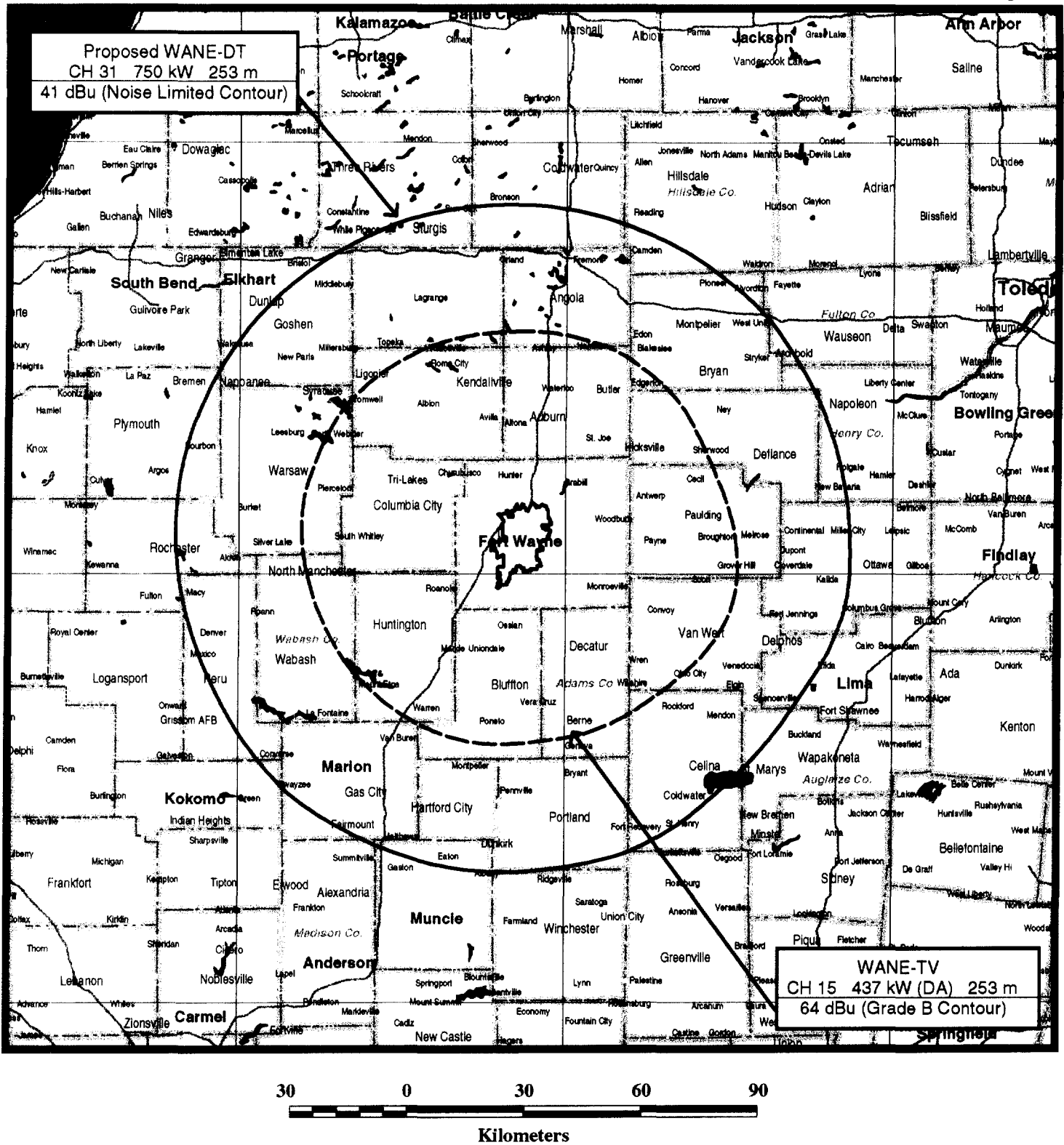
\*Considers interference "masking" from other NTSC and DTV assignments.

II. Service<sup>2</sup>

|                                | Population       |
|--------------------------------|------------------|
| Within Noise Limited Contour   | 1,097,209        |
| Not Affected by Terrain Losses | 1,096,950        |
| Lost to NTSC Interference      | 11,935           |
| Lost to DTV Interference       | 20,933           |
| <b>Total Service</b>           | <b>1,064,082</b> |

<sup>1</sup> The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

Figure 3



TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV ALLOTMENT TABLE  
STATION WANE-TV  
FORT WAYNE, INDIANA

### CANADIAN NTSC/DTV WITHIN STUDY

```

Job Title :Proposed WANE-DT
Sorted by Channel
Channels 30 to 32
TV/DTV Within 400.0 km
FCC TV DB Date : 10/01/99
Coordinates : 41-05-38 85-10-48

```

| Call     | City    | Channel      | ERP(kw) | Latitude | Bearing            | Distance      |
|----------|---------|--------------|---------|----------|--------------------|---------------|
| Status   | State   | FCC File No. | Zone    | HAAT(m)  | Longitude deg-True | (km) (mile)   |
| CICOTV32 | WINDSOR | 32(+)        | 217     | 42-09-09 | 56.83              | 219.82 136.62 |
| LIC      | ON      | -            | I       | 214      | 82-57-05           |               |
| CICO-TV  | WINDSOR | 32           |         | 42- 9- 9 | 56.83              | 219.82 136.62 |
| NTSCC    | ON      |              |         | 82-57- 5 |                    |               |

\*\* End of TV Within Study \*\*